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FARM CREDIT WEST, FLCA  
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9 **UNITED STATES BANKRUPTCY COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**  
11 **SANTA ANA DIVISION**

12 In re  
13 NORTHERN HOLDINGS, LLC,  
14  
15 Debtor.

Case No. 8:20-bk-13014-MW

Chapter 11

**NOTICE OF CONTINUATION OF  
PERFECTION OF SECURITY  
INTERESTS; DEMAND FOR ADEQUATE  
PROTECTION; AND DEMAND OF  
SEQUESTRATION OF CASH  
COLLATERAL PURSUANT TO 11 U.S.C.  
§§ 362(b)(3), 363(c)(4), 363(e), 546(b), AND  
552(b)**

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19 **TO THE HONORABLE MARK S. WALLACE, UNITED STATES BANKRUPTCY**  
20 **JUDGE; THE DEBTOR AND THE DEBTOR'S COUNSEL:**  
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22 **NOTICE IS HEREBY GIVEN** that Farm Credit West, FLCA ("FCW"), by and through  
23 its attorneys of record, gives notice pursuant to 11 U.S.C. §§ 546(b) and 552<sup>1</sup> of the continued  
24 perfection of its security interests in all rents, issues, profits, and proceeds related to, connected  
25 with, or arising from those certain real properties commonly referred to as APN 026-342-039,  
26 026-104-001, 027-145-022 in San Luis Obispo County, California (the "Properties"), in cash and  
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<sup>1</sup> FCW reserves the right supplement or amend this Notice.  
3605399.1 | 100967-0004

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1 cash equivalents, accounts, goods, equipment, farm products, general intangibles, inventory, any  
2 substitutions or accessions to any of the foregoing, and proceeds related thereto, connected with,  
3 or arising from the foregoing (the "Collateral").

4 **PLEASE TAKE FURTHER NOTICE** that this Notice is given pursuant to the exception  
5 to the automatic stay set forth in 11 U.S.C. § 362(b)(3). FCW asserts and reserves its right to seek  
6 further relief under applicable law. Further, this notice does not constitute a waiver of any rights  
7 and remedies under the Bankruptcy Code,<sup>2</sup> under applicable non-bankruptcy law, or any  
8 agreement with the Debtor.

9 **PLEASE TAKE FURTHER NOTICE** that FCW does not consent to the use of any cash  
10 collateral as that term is defined in 11 U.S.C. § 363(a) and proceeds of the Collateral.  
11 Accordingly, demand is hereby made pursuant to 11 U.S.C. §§ 363(c)(4) and 363(e) that any cash  
12 collateral or the proceeds of the Collateral be sequestered for the benefit of FCW and that an  
13 accounting of the use of cash collateral be provided to the undersigned immediately.

14  
15 DATED: October 29, 2020

FRANDZEL ROBINS BLOOM & CSATO, L.C.  
MICHAEL J. GOMEZ

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18 By: /s/ Michael J. Gomez  
19 MICHAEL J. GOMEZ  
20 Attorneys for Secured Creditor  
21 FARM CREDIT WEST, FLCA  
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2 <sup>2</sup> 11 U.S.C. § 101, *et seq.*  
3605399.1 | 100967-0004

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 1000 Wilshire Boulevard, 19<sup>th</sup> Floor, Los Angeles, California 90017-2427.

A true and correct copy of the foregoing document entitled (*specify*): NOTICE OF CONTINUATION OF PERFECTION OF SECURITY INTERESTS; DEMAND FOR ADEQUATE PROTECTION; AND DEMAND OF SEQUESTRATION OF CASH COLLATERAL PURSUANT TO 11 U.S.C. §§ 362(b)(3), 363(c)(4), 363(e), 546(b), AND 552(b) will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) October 29, 2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Nancy S Goldenberg nancy.goldenberg@usdoj.gov
- Matthew D. Resnik matt@rhmfir.com, roksana@rhmfir.com; janita@rhmfir.com; susie@rhmfir.com; max@rhmfir.com; priscilla@rhmfir.com; pardis@rhmfir.com; russ@rhmfir.com; rebecca@rhmfir.com; david@rhmfir.com; sloan@rhmfir.com
- United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) , I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**

(*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on October 29, 2020, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Honorable Mark S. Wallace  
United States Bankruptcy Court  
Central District of California  
Ronald Reagan Federal Building and Courthouse  
411 West Fourth Street, Suite 6135 / Courtroom 6C  
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 29, 2020

David T. Moore

/s/ David T. Moore

Date

Type Name

Signature